

GIP Implementation plan – proposed by DEP

May 7, 2004

Prepared by Andrew Fisk

Beginning June 1, 2004 –

Formal agreement to proceed with the following steps prior to creation of TMDL and licenses in winter 2004. All actions taken prior to the issuance of TMDL and licenses will be agreed to in writing by the mills and GIPOP.

All mills -

- 1/6 immediate reductions in total P through September 30
- 3/week total and ortho-P measurements as composite sample of effluent thru September 30 submitted monthly with existing discharge monitoring reports.
- P balance submitted to DEP w/ plans for ongoing monitoring of P in WWTP influent, sludge, and effluent. Plan should document how P additions are to be reduced and managed in system.
- Mill specific spill control plan submitted to DEP outlining feasibility, costs, and implementation plan for additional spill control in order to control BOD and P inputs to WWTP.
- Monitoring of GIP for algae blooms per attached plan.
- Submit a mill specific training plan for WWTP operators to learn additional phosphorous control strategies or to document existing training certifications for phosphorous control.

Facility specific details:

MeadWestvaco

- Baseline P loading from mill –240 lb [License flow 34 MGD & .85 ppm [P]

IP

- Increase treatment volume & retention time of WWTP through removal of solids from aeration basin.
- Improve aeration basin configuration.
- Develop plan to reduce use of polymer.
- Submit flow reduction study to DEP.
- Continued biomonitoring of Livermore Falls impoundment to verify present TSS number for attainment with Class C standards.
- Assess viability of adequate number of flushing flows through Livermore Falls impoundment to mitigate TSS deposition.
- Use of 60Q10 flow for biomonitoring data in Livermore Falls impoundment equals a 8,700 TSS number.
- Baseline P loading from mill –298 lb [License flow 51 MGD & .7 ppm [P].

Fraser – Nexfor

- Submit plan for how P control to WWTP will be evaluated and implemented, including operator training
- Submit an assessment of how use of north aeration basin and changes to flow arrangements could be implemented to make reductions in BOD, TSS, and P.
- Baseline P loading from mill – 200 lb

FPL / GIPOP

- Evaluate redesign of GIPOP to more efficiently deploy oxygen through existing system.
- Design new system to deliver a total of 150,000 to 210,000 ppd of oxygen into Pond.
- Submit report as required for CFR 125.3.f.

POTWs

- Begin monitoring for effluent P as described separately.
- Begin plan for implementation of P reductions to 1 ppm at actual flows limit.